

AMENDMENTS TO THE DRAWINGS

The attached sheets of drawings include replacement sheets for FIGs. 1, 2, 3, and 4A-4G. Annotated sheets showing changes are not submitted because from the Draftsman's comments, it appears that a printer/copier misalignment may have been the source of the misaligned figures on the drawing sheets.

Attachment: Replacement Sheets

REMARKS

The title of the patent application has been changed.

Replacement drawing sheets are submitted herewith.

Claims 1, 12, and 23 are amended to add "hyper-text transport protocol." These claims are also amended to clarify that the traversing of the objects in the object model includes comparing a property name from the request to a property name of an object defined in the object model. An example embodiment is illustrated in FIG. 3, #310. The amendments are made for the purpose of expediting prosecution and not for patentability.

Claims 1-24 are pending in the application. Reconsideration and allowance of the application are respectfully requested.

The rejection of claims 12-24 as being directed to non-statutory subject matter is respectfully traversed because the Office Action does not establish a *prima facie* case that the invention as a whole is directed solely to an abstract idea or to manipulation of abstract ideas or does not produce a useful result. However, claim 12 is amended to clarify the web server consistent with the example embodiment described in paragraph [0022].

Independent claim 23 is in means plus function format. The Office Action does not consider the structure disclosed in the specification in alleging that the claims are directed to non-statutory subject matter. ("The PTO may not disregard the structure disclosed in the specification corresponding to such language when rendering a patentability determination." *In re Donaldson Co.*, 16 F.3d 1189, 29 USPQ2d 1845 (Fed. Cir. 1994) MPEP 2181). Example structure for performing the claimed functions is described in paragraphs [0022], [0023], and [0073]. Therefore, no amendment to claim 23 is understood to be needed, and the rejection should be withdrawn.

The rejection of claims 1, 2, 11-13 and 22-23 as being anticipated by "Mein" (US patent 6,782,542 to Mein et al.) under 35 USC §102(e) is respectfully traversed. The rejection is traversed because the Office Action does not show that all the limitations of the claims are taught by Mein.

Mein is not understood to teach or suggest the limitations of traversing objects in the object model in response to each property name obtained from the HTTP-form-processing request. The cited teachings of Mein do not suggest that the objects in the object model are in any apparent manner traversed. Rather the cited teachings of Mein suggest use of progid to instantiate an automation class. Thus, there is no apparent need for Mein to perform any traversal of objects in the object model. Even though no amendment is understood to be necessary to distinguish over Mein, limitations are added to further clarify the invention (the traversing including comparing a property name from the request to a property name of an object defined in the object model).

The limitations of traversing the object model permit both the client and the server to operate without an added protocol layer that sits over HTTP [0004], which Mein clearly requires. For example, in Mein, both the client and server are required to have components for interfacing via the SOAP (FIG. 2, 140, 170), and the SOAP is layered over HTTP. The claimed invention does not require a SOAP-type protocol because it traverses the object model property names from the HTTP request.

Independent claims 12 and 23 include limitations similar to those of claim 1. Claims 2 and 11 depend from claim 1, and claims 13 and 22 depend from claim 12. Thus, the limitations of claims 1, 11-13, and 22-23 are not shown to be taught by Mein for at least the reasons set forth above. The rejection of claims 1, 2, 11-13 and 22-23 as being anticipated by Mein should be withdrawn.

The Office Action fails to establish that claims 3, 14 and 24 are unpatentable under 35 USC §103(a) over Mein in view of "Smith-1" (U.S. Patent No. 6,973,659 to Smith et al.). The rejection is respectfully traversed because the Office Action fails to show that all the limitations are suggested by the references and fails to provide a proper motivation for modifying the teachings of Mein with teachings of Smith-1.

Claim 3 includes limitations of creating an event queue in response to a first keyword obtained from an HTTP-form-processing request. The Office Action does not show how Smith-1 is alleged to suggest these limitations. The portions of Smith-1 relied upon in the Office Action indicate that a dispatcher receives all events and passes them to service instances. There is no apparent suggestion or indication that

Smith-1's dispatcher creates any event queue in response to a keyword in an HTTP request. Thus, Smith-1's clients have no apparent direct control over whether an event queue is or isn't created.

Furthermore, Smith-1's teachings do not suggest that events in the event queue are returned to the client in response to a third keyword obtained from an HTTP-form-processing request. The cited portions of Smith-1 clearly indicate that events are fired on the SLEE server and a value object is eventually returned to the client based on the service invoked by the event on the SLEE server (col. 6, l. 63 – col. 7, l. 23). Thus, events are not returned to the client as claimed.

Claims 14 and 24 include limitations similar to those of claim 3, and the limitations are not shown to be suggested for at least the reasons set forth above.

The alleged motivation for combining Smith-1 with Mein is conclusory and improper. The alleged motivation is that "it would have been obvious ... to combine the teachings of Smith-1 and Mein because Smith-1's teachings provides efficient flexible mechanisms for multiple interfaces to communicate events with the call, thereby simplifying the service logic interfaces." There is no evidence presented that Mein is in any way inefficient or inflexible in providing its communications interfaces. Nor is there any evidence presented that suggests how Mein would be made more efficient or flexible when combined with Smith-1's teachings. Therefore, the alleged motivation is unsupported by evidence and improper.

The rejection of claims 3, 14, and 24 should be withdrawn because a *prima facie* case of obviousness has not been established.

The Office Action fails to establish that claims 4, 5, 15 and 16 are unpatentable under 35 USC §103(a) over Mein in view of "Ringseth" (U.S. Patent No. 7,055,143 to Ringseth et al.). The rejection is respectfully traversed because the Office Action fails to show that all the limitations are suggested by the references and fails to provide a proper motivation for modifying the teachings of Mein with teachings of Ringseth.

The cited teachings of Ringseth do not suggest aborting the processing in response to an annotated property associated with the property name from the HTTP-form. Ringseth's example is the failure of an upstream processor to communicate (col.

13, l. 9-32). There is no apparent reasonable suggestion of any annotated property associated with the property name from the request. If the rejection is maintained, an explanation is requested as to the element of Ringseth thought to correspond to the annotated property and the property name from the request. Otherwise the rejection should be withdrawn.

Claim 5 depends from claim 1, and the limitations are not shown to be suggested for at least the reasons set forth above. Claim 15 includes limitations similar to those of claim 4, and claim 16 includes limitations similar to those of claim 5. Therefore, the limitations of claims 15 and 16 are not shown to be suggested.

The alleged motivation for combining Ringseth with Mein is improper because of a lack of evidence that would motivate one to make the combination. The alleged motivation simply states the function of Ringseth without providing evidence of why one would be motivated to change Mein. Therefore, the alleged motivation is improper.

The rejection of claims 4, 5, 15 and 16 over the Mein-Ringseth combination should be withdrawn because a *prima facie* case of obviousness has not been established.

The Office Action fails to establish that claims 6-10 and 17-21 are unpatentable under 35 USC §103(a) over Mein in view of "Smith-2" (U.S. Patent No. 7,017,162 to Smith et al.). The rejection is respectfully traversed because the Office Action fails to show that all the limitations are suggested by the references and fails to provide a proper motivation for modifying the teachings of Mein with teachings of Smith-2.

Claim 6 includes limitations of: for a reference-type property of an object found in traversing the object model, generating a unique identifier for the reference-type property, registering the unique identifier for the reference-type property in a collection, and returning a Uniform Resource Identifier (URI) that includes the unique identifier to the client. The cited elements of Smith-2 do not reasonably correspond to these limitations.

Smith-2's Value type class that is a reference type (col. 11, l. 1 – col. 12, l. 15 is cited as corresponding to the claimed reference-type property in the object model, and Smith-2's definition of a GUID is cited as corresponding to the claimed generating of the

unique identifier for the reference-type property. There is no citation of any portion of Smith-2's teachings that suggests that Smith-2 generates a unique identifier for the Value type class. Thus, the limitations of claim 6 are not shown to be suggested by the Mein-Smith-2 combination.

Claims 7-10 include limitations that refine the limitations of claim 6, and the limitations of claims 7-10 are similarly not shown to be suggested by the Mein-Smith-2 combination. Claims 17-21 include limitations similar to those of claims 6-10, and the limitations of these claims are also not shown to be suggested by the Mein-Smith-2 combination.

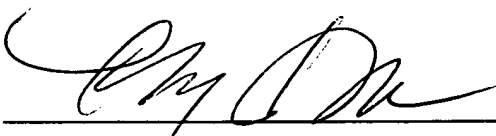
The alleged motivation for combining Smith-2 with Mein is improper because of a lack of evidence that would motivate one to make the combination. The alleged motivation simply states the function of Smith-2 without providing actual evidence that would motivate one to modify Mein. Therefore, the alleged motivation is improper.

The rejection of claims 6-10 and 17-21 over the Mein-Smith-2 combination should be withdrawn because a *prima facie* case of obviousness has not been established.

Withdrawal of the rejections and reconsideration of the claims are respectfully requested in view of the remarks set forth above. No extension of time is believed to be necessary for consideration of this response. However, if an extension of time is required, please consider this a petition for a sufficient number of months for consideration of this response. If there are any additional fees in connection with this response, please charge Deposit Account No. 50-0996 (USYS.061PA).

Respectfully submitted,

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APPENDIX

